

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IAN J. BROWN, JAMES BROWN,
and BARBARA BROWN,

Plaintiffs,

v.

UNITED STATES OF AMERICA,
VERIZON NEW ENGLAND, INC.,
and BOSTON EDISON COMPANY
d/b/a/ NSTAR ELECTRIC,

Defendants.

UNITED STATES OF AMERICA,

Third-Party Plaintiff,

v.

TOWN OF BEDFORD,

Third-Party Defendant.

C.A. No. 04cv11924-RGS

**UNITED STATES OF AMERICA'S THIRD-PARTY COMPLAINT
AGAINST THE TOWN OF BEDFORD**

COUNT ONE (CONTRIBUTION)

1. The United States of America, the third-party plaintiff, administers agencies entitled the "Department of Navy" and the "Department of the Air Force."

2. The third-party defendant, the Town of Bedford, administers the Town of Bedford Department of Public Works in Bedford, Massachusetts, which controls and maintains Hartwell Road in Bedford, Massachusetts.

3. Plaintiffs, Ian J. Brown, James Brown, and Barbara

Brown, allege that they have suffered damages as a result of a single-vehicle motor vehicle accident that occurred on or about January 4, 2002, on Hartwell Road in Bedford, Massachusetts.

4. Plaintiffs allege that the United States, Verizon, and Boston Edison negligently caused their injuries.

5. The Court has jurisdiction over this count pursuant to 28 U.S.C. §§ 1346(b)(1) and 1367.

6. The United States denies that it acted wrongly in any manner or that it caused Plaintiffs' injuries. However, if the United States is deemed or adjudged liable to the Plaintiffs in the above-captioned action, then the Town of Bedford is jointly liable and the United States is entitled to contribution from the Town of Bedford.

WHEREFORE, the United States demands judgment against the Town of Bedford for a pro rata share of any sum that may be adjudged against the United States in favor of the Plaintiffs.

Respectfully submitted,

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